

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**ROTHSCHILD BROADCAST
DISTRIBUTION SYSTEMS, LLC,**

Plaintiff,

v.

AIRCALL.IO, INC.,

Defendant.

CIVIL ACTION NO. 1:20-cv-09657-JSR

JURY TRIAL DEMANDED

UNOPPOSED MOTION TO STAY ALL DEADLINES

Now comes Plaintiff, Rothschild Broadcast Distribution Systems, LLC by and through its undersigned counsel hereby request the court to stay all current deadlines for 30 days. The parties have reached an agreement in principal that will resolve the matter between them. The parties need additional time to finalize the agreement. Accordingly, the parties file this joint motion for a stay of all pending deadlines for 30 days, until and including March 1, 2021. This stay is not sought for the purpose of delay but so that justice may be served.

Dated: January 28, 2021

Respectfully submitted,

KIZZIA JOHNSON PLLC

/s/Jay Johnson

Jay Johnson

1910 Pacific Avenue, Suite 13000

Dallas, Texas 75201

Phone: (214) 451 -0164

Facsimile: (214) 451-0165

jay@kjpllc.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that the undersigned counsel conferred with counsel for Defendant and counsel for Defendant does not opposed this motion.

/s/ Jay Johnson
JAY JOHNSON

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed electronically and served by operation of the Court's electronic filing system on January 28, 2021. Parties may access the foregoing through the Court's system.

/s/Jay Johnson
Jay Johnson